

**Exhibit A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re :**

**Chapter 11**

**SEARS HOLDINGS CORPORATION, *et al.*,**

**Case No. 18-23538 (RDD)**

**Debtors.**  
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**(Jointly Administered)**

**ORDER GRANTING KOOLATRON CORPORATION'S MOTION TO COMPEL  
PAYMENT OF RESERVED FUNDS HELD PURSUANT TO THE ADMINISTRATIVE  
EXPENSE CLAIMS CONSENT PROGRAM AND ANY ADDITIONAL AMOUNTS  
DUE AND OWING**

Koolatron Corporation having filed its Motion to Compel Payment of Reserved Funds Held Pursuant to the Administrative Expense Claims Consent Program and Any Additional Amounts Due and Owing; and due and proper notice of the Motion having been provided; and the Court having determined that the legal and factual bases set forth in the Motion establish cause for the relief requested therein,

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED.
2. Debtors shall pay Koolatron Corporation \$217,042.32 from the Estimated Reserve as set forth in Doc. No. 8293, Pg. 64 and Doc. No. 8350, Pg. 60 in partial satisfaction of its Administrative Expense Claims within two business days of entry of this Order.
3. Debtors shall pay Koolatron Corporation any other additional amounts due and owing under the Administrative Expense Claims Consent Program or the confirmed Plan within two business days of entry of this Order.
4. This Order does not preclude Koolatron Corporation from seeking any other additional or different relief of any kind with respect to its Administrative Expense Claims.

Dated: , 2021

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HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE